

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff

v.

DESMOND WHITE

Defendant

Case No. 19 CR 201-14

Judge Sara L. Ellis

MOTION FOR MODIFICATION OF CONDITIONS OF PRETRIAL RELEASE

Desmond White (“Desmond”), through his undersigned counsel, respectfully requests that the Court modify the conditions of his pre-trial release in the following two ways: (1) change his release from home incarceration to home detention / curfew in order to permit employment; and (2) change the assignment of his supervising Pretrial Services officer. In support of this motion, Desmond states as follows:

1. On October 15, 2019, the Court set forth conditions of pre-trial release for Desmond upon his release from state custody on October 25, 2019. Dkt. 427.
2. On December 17, 2019, the Court modified Desmond’s conditions of release to include home incarceration. Dkt. 440.
3. On January 22, 2020, the Court modified Desmond’s bond to allow participation in drug treatment for state parole requirements. Dkt. 451.
4. On February 12, 2020, the Court modified the conditions of Desmond’s pre-trial release to include substance abuse and mental health treatment and counseling provided by Pretrial Services. Dkt. 461. Pretrial Services also changed Desmond’s electronic monitoring to GPS monitoring. Dkt. 462.

5. Desmond respectfully requests that the Court modify the conditions of his pre-trial release from home incarceration to home detention / curfew in order to permit employment. Desmond requests this modification so he can support himself and be less of a financial burden on his grandmother, Sheila Butler Johnson, with whom he is living.

6. Desmond also respectfully requests that the Court change the assignment of his supervising Pretrial Services officer. Effective communication with Desmond's currently-assigned Pretrial Services officer, Victor Alvarez, has broken down. For example, on or about February 14, 2020, Mr. Alvarez made an unannounced visit to the residence of Desmond's grandmother. Desmond was present. In a heated exchange with Desmond, Mr. Alvarez indicated that he wanted Desmond to be locked up. Desmond's grandmother was present for and can corroborate this exchange. Mr. Alvarez, through clear actions and words, has indicated on numerous occasions that he does not believe, or trust statements made by Desmond. For example, he called him a liar. Because of the deterioration of the relationship evidenced by the break down of communication and a perceived lack of respect by Mr. Alvarez towards Desmond, Desmond requests that the Court change the assignment of Desmond's supervising Pretrial Services officer.

7. Finally, Desmond's great grandmother, Katherine Butler (his grandmother, Sheila Butler Johnson's mother), passed away last week. Mr. Alvarez indicated to counsel that Desmond would receive permission to attend the memorial services, currently scheduled for February 29, 2020. Desmond requests that upon assignment of a new Pretrial Services officer, the Court direct that Desmond may still attend his great grandmother's memorial services.

For the foregoing reasons, Desmond respectfully requests that the Court modify the conditions of his pre-trial release to (1) change his release from home incarceration to home detention / curfew to permit employment; and (2) change the assignment of his supervising Pretrial Services officer.

Dated: February 20, 2020

Respectfully submitted,

/s/ Matthew C. Crawl
Matthew C. Crawl
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CERTIFICATE OF SERVICE

I hereby certify that on February 20, 2020 I caused a copy of the foregoing document to be filed using the Court's CM/ECF filing system, which will send notice of this filing to all counsel of record. Additionally, a copy of the foregoing documents was sent via electronic mail to the Pre-Trial Services officer at: Victor_Alvarez@ilnpt.uscourts.gov.

/s/ Matthew C. Crowl